

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

LINDA THORNTON,)

Plaintiff,)

Vs.) CIVIL ACTION NO.: 1:07CV712-WKW

FLAVOR HOUSE PRODUCTS, INC., and)

FRANKLIN D. WILLIAMS, Jr.,)

Defendants.

DEFENDANT FRANKLIN D. WILLIAMS, Jr.'s
MOTION FOR PROTECTIVE ORDER

COMES NOW THE DEFENDANT, Franklin D. Williams, Jr., and hereby files his Motion for Protective Order, stating as follows:

1. A protective order should be granted for the Defendants, limiting the scope discovery into Mr. Williams' past criminal history and Mr. Williams' deposition and subsequent trial testimony for the following reasons:

2. The information is not admissible under Fed.R.Ev. 415.
3. The information sought is not relevant to or probative of any issues in this case.
4. If the information were deemed relevant, the information would be inadmissible under Fed.R.Ev. 403 because its potential prejudicial effect would outweigh any probative value.

WHEREFORE ALL PREMISES CONSIDERED, this Defendant, Franklin D. Williams, Jr., states that a protective order should be GRANTED, limiting the scope of discovery into Mr. Williams' past criminal history and Mr. Williams' deposition testimony and subsequent trial testimony for the above-mentioned reasons.

RESPECTFULLY DONE AND SUBMITTED, this the 27th day of February, 2008.

/s/ Richard E. Crum, Esq.

Richard E. Crum, Esq.

Attorney for Defendant,
Franklin D. Williams, Jr.

OF COUNSEL
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below and if not available to receive electronic transmissions, via United States Postal Service, postage prepaid:

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This the 27th day of February, 2008.

/s/ Richard E. Crum, Esq.

Of Counsel